

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE IMPLANT)	
PRODUCTS LIABILITY LITIGATION)	MDL NO. 2272
)	
This Document Relates To:)	
)	Docket No.: 1:11-cv-05488
James Krammes and Deborah Krammes, h/w)	
Plaintiffs)	
)	Judge Rebecca R. Pallmeyer
v.)	
)	
ZIMMER, INC., et al., Defendants.)	
)	

PLAINTIFFS, JAMES AND DEBORAH KRAMMES, RESPONSE TO
ZIMMER ENTITIES' MOTION FOR SUGGESTION OF REMAND

Plaintiffs, James Krammes and Deborah Krammes, respectfully request that this Court deny Defendant, Zimmer Entities, Motion for Suggestion of Remand and leave this case in the MDL as so ordered by the Judicial Panel on Multidistrict Litigation as part of its August 8, 2011 Transfer Order.

The grounds for Plaintiffs' Response to Defendants' Motion for Suggestion of Remand are set forth in the supporting brief, filed contemporaneously. Plaintiffs also incorporate by reference the grounds set forth in the Plaintiffs' Steering Committee's Omnibus Memorandum in Opposition to Defendants Zimmer Entities' Motion for Suggestion of Remand (PSC' Omnibus Memorandum in Opposition).

WHEREFORE, Plaintiffs' respectfully move that this Court deny Defendants' Suggestion for Remand in this instant case.

Respectfully submitted,

ANAPOL SCHWARTZ

By: /s/ James R. Ronca

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Date: April 5, 2012

CERTIFICATE OF SERVICE

I certify that on April 5, 2012, a copy of the foregoing Plaintiffs, James And Deborah Krammes, Response To Zimmer Entities' Motion For Suggestion Of Remand was filed electronically. Parties may access this filing through the Court's system.

**ANAPOL, SCHWARTZ, WEISS,
COHAN FELDMAN & SMALLEY, P.C.**

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